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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	CR 10-00731 LHK
Plaintiff,)	
v.)	STIPULATION AND PROPOSED
DUNG QUOC VO,)	ORDER DOCUMENTING EXCLUSION
Defendant.)	OF TIME UNDER SPEEDY TRIAL ACT
)	FROM MARCH 14, 2012 TO APRIL 4,
)	2012.

The defendant, Dung Quoc Vo, and the government together respectfully stipulate as follows:

1. A status conference or change of plea hearing in this matter is currently set for March 14, 2012;
2. The parties are conferring over a potential disposition. Additional facts regarding the case have come to light since the last status conference and require additional investigation by the government and the defense.

In order to provide time for this investigation, the parties request that the Court set the matter for change of plea or status conference on April 4, 2012, at 9:00 a.m. The parties jointly request that the Court exclude the period of time between March 14, 2012, and April 4, 2012, under the

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STIPULATION AND ~~PROPOSED~~ ORDER
RE SPEEDY TRIAL ACT

Speedy Trial Act for effective preparation of counsel, taking into account the exercise of due diligence. *See* 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv).

IT IS SO STIPULATED.

Dated: March 13, 2012

GEOFFREY A. HANSEN
Acting Federal Public Defender

/s/
VARELL FULLER
Counsel for Defendant

Dated: March 13, 2012

MELINDA HAAG
United States Attorney

/s/
MICHELLE J. KANE
Assistant United States Attorney

ORDER

The Court finds that, taking into the account the public interest in the prompt disposition of criminal cases, granting the continuance until April 4, 2012, is necessary for effective preparation of counsel and of defense counsel. *See* 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv). Given these circumstances, the Court finds that the ends of justice served by excluding the period from March 13, 2012, through April 4, 2012 outweigh the best interest of the public and the defendant in a speedy trial. *Id.* § 3161(h)(7)(A).

Accordingly, and with the consent of the defendant, the Court (1) sets a hearing on April 4,
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2012, at 9:00 a.m. and (2) orders that the period from March 14, 2012, through April 4, 2012, be excluded from Speedy Trial Act calculations under 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv).

IT IS SO ORDERED.

Dated: 3 / 13, 2012


LUCY H. KOH
United States District Judge